

HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NORTHSHORE SHEET METAL, INC.,

Plaintiff,

v.

SHEET METAL WORKERS
INTERNATIONAL ASSOCIATION,
LOCAL 66,

Defendant.

No. 2:15-cv-01349 MJP

DECLARATION OF MARGARET
BURNHAM

Margaret Burnham makes the following declaration:

1. I am co-counsel for the Sheet Metal Workers International Association, Local 66 ("Local 66").
2. On February 3, 2016, I had a telephone conversation with Northshore Sheet Metal, Inc.'s ("Northshore") counsel Christopher Hilgenfeld. Both parties agreed, by and through their attorneys, that they would request the case schedule be continued for sixty (60) days to allow adequate time to conduct discovery.

DECLARATION OF MARGARET
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ROBBLEE DETWILER & BLACK
ATTORNEYS at LAW

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4. Once the Order granting the Protective Order was issued on January 27, 2016, the parties recommenced the discovery process.

5. Local 66's strike against Northshore is ongoing.

6. The parties have yet to successfully negotiate a collective bargaining agreement.

I declare under penalty of perjury of the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

SIGNED in Seattle, Washington this 5th day of February, 2016.


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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of February, 2016, I filed the foregoing
DECLARATION OF MARGARET BURNHAM with the Clerk of the Court using the
CM/ECF system which will send notice of such filing to the following:

Christopher L. Hilgenfeld
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s/Margaret Burnham
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